

### REMARKS

Applicants respectfully request reconsideration and allowance of all pending claims in view of the above-amendments and the following remarks.

#### I. DALTON

Claims 1-20 were rejected under §102(e) as being allegedly anticipated by Dalton., U.S. Patent No. 6,951,017.

##### A. **Publication Date of Dalton**

Applicants note that the Dalton patent issued September 27, 2005, which was after the filing date of December 1, 2003 for the present application.

Thus, the Dalton patent is available as prior art only under §102(e), as applied in the Office Action, and cannot be applied under §103.

##### B. **Dalton**

In Dalton, the intent is to migrate files from one directory structure (design system) to another directory structure (design system). It is like a one-time event.

In an example of the present application, the intent is to find files that are located somewhere in a directory structure, create a list of those files, and feed them to a tool. In one example, the need for hard-coded paths in shell script usage is removed. For example, RTL files could be located in several sub-directories in the directory structure and a designer may want to synthesize them to create a gate-level netlist. The .rmk files are used to define which files are the RTL files. In general the tool finds these .rmk files, figures out which design files are the RTL files (or whichever design files have been requested to be found/gathered), and returns a list of the RTL files including the path name in the existing directory structure so that list can be fed to and used by the synthesis tool in accessing the design files.

In Dalton, each input file that contains a reference to a directory path in the previous design system (previous directory structure 100) is modified to reference directory paths in the new or updated design system (new directory structure 102). (Col. 3, lines 57-61 and col. 7, lines 46-50).

**C. Claim 1**

Claim 1 is amended to include, “accessing at least one of the design files within that directory structure by a design tool through a combination of the file path, to the description file, identified in the index and the file path, to the design file, defined by the description file.”

In Dalton, design files are migrated from one directory structure to another directory structure, not accessing the design files by a design tool within the same directory structure.

Further, Dalton does not disclose accessing a design file by a design tool through a combination of a file path to a description file that is identified in an index and a file path to the design file that is defined by that description file.

With respect to claims 5 and 8, for example, the Office Action refers to col. 4, lines 35-45 (“... generating mapping file ... combine the process ....”) This paragraph appears to be cited merely for the use of the word “combine”, even though the paragraph has nothing to do with combining file paths. Rather, it relates to combining separate processes.

The Office Action also refers to col. 4, line 24, where Dalton refers to a modification syntax, “S/OLD/NEW/g”. The “S” means “substitute” and the “g” means “global”. This string is therefore processed to substitute globally each occurrence of “OLD” with “NEW”.

**D. Independent Claims 10 and 13**

Independent claims 10 and 13 are amended in a similar fashion as claim 1 and are therefore also not anticipated by Dalton.

Since Dalton does not anticipate each and every element of independent claims 1, 10 and 13, Applicants respectfully request that the rejection of these claims and their respective dependent claims under §102(e) be withdrawn.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 12-2252.

Respectfully submitted,  
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